



Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., S.W. Room 4008
Washington, DC 20250

RE: National Organic Program, Sunset Review, Docket number TM-04-07

Dear Mr. Neal;

CROPP Cooperative respectfully submits these comments to the AMS regarding the above referenced docket.

CROPP Cooperative's "Organic Valley" label is the nation's largest farmer-owned certified organic brand. The Cooperative's membership includes over 700 organic family farms in 17 states. The Cooperative produces an extensive line of refrigerated dairy products, eggs, juices, produce and meat, all of which are certified organic. The Cooperative's total revenues were in excess of \$200 million in 2004. The focus of the Cooperative is to provide certified organic products recognized by consumers as a trusted food source supporting family farms, humane treatment of farm animals, sustainable agricultural production, and environmental protection.

CROPP Cooperative strongly supports the process that the NOP and NOSB has utilized in carefully reviewing substances that have been included on the National List. CROPP supports the renewal of all substances on the National List except for oxytocin and ivermectin, and in particular, CROPP supports the renewal of the substances listed below.

CROPP supports the discontinuance of the following two substances:

- Oxytocin CROPP Cooperative requires that any animal treated with oxytocin on an emergency basis must be removed from the organic herd. Our consumers tell us that any supplemental hormone use is undesirable, and incompatible with organic agriculture
- Ivermectin CROPP Cooperative believes Ivermectin should be replaced with Moxidectin, which has been approved by the NOSB, but not yet added to the National List by the NOP.

CROPP Cooperative supports the continued use of the substances on the National List for organic crop and livestock production, and in particular, supports the continued listing of the following substances for organic crops and organic livestock production:

Name of Substance	Location on National List	Reason for continued allowance
Chlorine Materials: <ul style="list-style-type: none"> • Calcium hypochlorite • Chlorine dioxide • Sodium hypochlorite 	205.601(a)(1)	Water purification
Ammonium carbonate	205.601(e)(1)	Pest control
Boric Acid	205.601(e)(2)	Pest control
Elemental sulfur	205.601(e)(4)	Pest control
Lime sulfur	205.601(e)(5)	Pest control
Horticultural oils	205.601(e)(6)	Pest control
Sticky traps	205.601(e)(8)	Pest control
Pheromones	205.601(f)	Pest management
Sulfur dioxide	205.601(g)(1)	Rodenticide
Vitamin D ₃	205.601(g)(2)	Rodenticide
Hydrated Lime	205.601(i)(3)	Plant disease control
Hydrogen Peroxide	205.601(i)(4)	Plant disease control
Lime sulfur	205.601(i)(5)	Plant disease control
Elemental sulfur	205.601(j)(2)	Soil amendment
Humic Acid	205.601(j)(3)	Soil amendment
Lignin sulfonate	205.601(j)(4)	Soil amendment
Magnesium sulfate	205.601(j)(5)	Soil amendment
Soluble boron products	205.601(j)(6)(i)	Micronutrient
Sulfates, carbonates, oxides or silicates of zinc, copper, iron	205.601(j)(6)(ii)	Micronutrient
Liquid fish products	205.601(j)(7)	Soil amendment
Vitamins B ₁ , C, and E	205.601(j)(8)	Soil amendment
Ethanol	205.602(a)(1)(i)	Disinfectant
Isopropanol	205.602(a)(1)(ii)	Disinfectant
Aspirin	205.602(a)(2)	Health care
Biologics – vaccines	205.602(a)(3)	Health care
Chlorhexidine	205.602(a)(4)	Health care
Name of Substance	Location on National List	Reason for continued allowance
Calcium hypochlorite	205.602(a)(5)(i)	Disinfectant
Sodium hypochlorite	205.602(a)(5)(ii)	Disinfectant
Chlorine dioxide	205.602(a)(5)(iii)	Disinfectant
Electrolytes	205.602(a)(6)	Medical treatment
Glucose	205.602(a)(7)	Medical treatment
Glycerine	205.602(a)(8)	Medical treatment
Hydrogen peroxide	205.602(a)(9)	Medical treatment
Iodine	205.602(a)(10)	Medical treatment
Magnesium sulfate	205.602(A)(11)	Medical treatment
Phosphoric acid	205.602(a)(14)	Cleaning chemical
Copper sulfate	205.602(b)(1)	Topical treatment
Iodine	205.602(b)(2)	Topical treatment
Lidocaine	205.602(b)(3)	Topical treatment
Lime, hydrated	205.602(b)(4)	External pest control

Milk Replacers*	205.602(c)	Feed supplement
Trace minerals	205.602(d)(2)	Animal health
Vitamins	205.602(d)(3)	Animal health

*CROPP Cooperative has found that the term "emergency use" should be clearly defined, as it may be subject to variable interpretation by the certifiers.

In addition, CROPP Cooperative supports the continued use of the substances on the National List with regard to processing, and in particular, CROPP Cooperative supports the continued use of the following substances for organic processing:

Name of Substance	Location on National List	Reason for continued allowance
Acids -Citric	205.605(a)	Processing
Acids -Lactic	205.605(a)	Processing
Calcium Carbonate	205.605(a)	Fortification
Carageenan	205.605(a)	Processing
Dairy Cultures	205.605(a)	Processing
Enzymes	205.605(a)	Processing
Flavors	205.605(a)	Processing
Nitrogen	205.605(a)	Processing
Calcium Citrate	205.605(b)	Fortification
Calcium Hydroxide	205.605(b)	Processing
Carbon Dioxide	205.605(b)	Processing
Chlorine Materials	205.605(b)	Sanitizing
Hydrogen peroxide	205.605(a)	Sanitizing
Nutrient vitamins	205.605(a)	Fortification
Potassium Carbonate	205.605(b)	Processing
Silicon Dioxide	205.605(b)	Processing
Sodium Phosphates	205.605(b)	Processing
Xanthum Gum	205.605(b)	Processing
Cornstarch (Native)	205.606(a)	Processing
Lecithin – unbleached	205.606(d)	Processing

Thank you very much for the opportunity to comment. Please free to contact me if you have any questions.

Sincerely,

/s/

Melissa Hughes
General Counsel
CROPP Cooperative